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Ms L Higby

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Dear Ms Higby

**Rochford Core Strategy Examination
Response to LPA Audit Trail**

Smart Planning represent West Rochford Action Group and was present on Day 2 of the Examination, Wednesday 12 May 2010. Under Matter 2, Location and Supply of New Homes, the LPA was asked by the Inspector at the beginning of the session to provide an 'audit trail' of activity to demonstrate that these matters had been approached in a demonstrably sound way.

As the session proceeded, more and more matters for which no apparent rationale had been provided were added to be covered in the audit trail. These included the assessment of agricultural land classification; the assessment of heritage and conservation assets; the assessment of green belt boundaries; in all respects the undertaking of a comparative analysis to find the most sustainable locations; in fact every key matter raised by the West Rochford Action Group and also in common with others' in the chamber that day. As each of these matters was raised, the LPA were unable to answer rudimentary questions which were hence deferred pending provision of the audit trail.

The audit trail has been put on the LPA's website and called Core Strategy General Housing Locations – Audit Trail. As far as we are aware, there has been no notification to interested parties present on Day 2 of this website posting and no link provided. We identified the document with some difficulty and access to the website has been unreliable from time to time hence on 29 June we were granted an extension until 1 July 2010 to produce a response. This letter constitutes WRAG's response to the LPA's audit trail. It should be read in conjunction with WRAG's original submission to the Core Strategy Submission Development Plan Document and the subsequent final submission to the Examination by Smart Planning

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The Inspector's first request for an audit trail on Day 2 preceded any of the specific questions that arose later in the session. As each question was asked, the Inspector confirmed with the Council's Head of Planning and Transportation, Shaun Scrutton, that the specific question asked would be answered in the audit trail to be provided. A written note appeared to be taken by Mr Scrutton. It is pertinent therefore to be reminded about the specific questions which we paraphrase as follows:

Questions to be Answered with Reference to the Audit Trail

- 1) Have the broad locations for development been assessed in terms of their agricultural land quality and versatility? (see Section 2.0 of Smart Planning's Examination Statement).
- 2) Have the broad locations been the subject of comparative assessment having regard to all other possible locations?
- 3) Where has the LPA weighed the options in deciding upon the future of best and most versatile land.
- 4) Where has the LPA taken '... competent advice' on this matter?

The same questions cropped up in relation to the following topics as set out in Smart Planning's Examination Statement i.e. Conservation and Heritage (Section 3.0) and Green Belt (Section 4.0). In the latter case there is a strong relationship between Conservation assets and the historic integrity of the green belt boundary at west Rochford. In each topic area the questions are common and can be framed as follows:

- 5) Where in the audit trail is it shown that say the Conservation and Heritage Assets of those broad locations have been assessed, noting the unique characteristics of West Rochford?
- 6) Have the broad locations been the subject of comparative assessment having regard to all other possible locations?
- 7) How was the decision to propose the broad locations for development derived?

The audit trail provided is singularly unhelpful in answering these specific questions and has therefore failed to fulfil what was asked by the Inspector. The opposite side of that coin is that the audit trail is helpful in that it demonstrates that the above questions have not been dealt with in the preparation of the Core Strategy.

An audit trail is a specific sequence of information like a road map. It should provide direction and clarity to the reader and make navigation to the salient points quick and easy and with a high degree of confidence. This audit trail does very few of these things. It represents a broad chronology of events and links in a huge number of background evidence base documents numbering several thousand pages. These are the same evidence base documents that we systematically trawled through before producing the Smart Planning Examination Statement. It is like looking for a needle in a haystack. The audit trail has not pin pointed the answers to the specific outstanding questions to any material degree.

We resist the temptation at this point to restate our case for unsoundness which is as previously set out. We would like to make some pertinent observations about the audit trail.

At best we see that the LPA's evidence base reaches a fairly reasonable conclusion that housing development should largely be directed towards the top tier settlements which includes Rochford. Beyond that there is apparently no reliable field of documented work that shows why West Rochford was chosen in the first place, and why that choice is more sustainable than North Rochford, South Rochford or East Rochford or indeed other sites elsewhere including on the edge of Rayleigh.

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As might be expected some of the issues that concern us are mentioned but there is no analysis. For example Appendix 3 to the 1 March 2006 Committee Report discusses a methodology for assessing the suitability of sites. It mentions Land Classification (page 2, para.2) and the need to try and protect high quality farmland. The matter rests there. There is information elsewhere about the facts of Agricultural land quality (e.g. p.140 –p.144 to the Essex County Council SEA and SA of the Regulation 25 Version of Draft Core Strategy DPD). There is no analysis and no comparative assessment.

In Appendix 3, 'Observations' are discussed and how these can affect the scoring of site assessments. The example of visual assessment is given, but equally this could include green belt boundary or conservation character to show how scores can be weighted to aid comparison of sites. Despite setting out a very basic methodology, it does not appear to have been applied at any time. The Appendix is principally occupied with scoring non-residential land in urban areas.

On page 10 of the audit trail under the heading 'Sustainability Appraisal of Preferred Options', the first paragraph refers to 'Preferred Options' and there is a seamless move to discuss 'preferred housing locations'. The latter mentions impact on the landscape and urban fringe but defers the consideration of this on the basis that it relies upon precise detail of scale and location. The problem here is that the broad locations must be assessed because it will be too late to discover a problem with agricultural land classification, or conservation asset, or historic green belt character once the Core Strategy has been adopted. A spatial strategy requires spatial analysis in order to inform decisions to meet development needs in the most sustainable way.

At the revised preferred options stage (page 13 of audit trail) it is acknowledged that the 'Council needed to be more spatially specific'. This stage should have resulted in preparation for a much greater degree of understanding for the spatial choices that were to follow. That did not appear to happen.

In Table 1 (starts page 15 of audit trail) there is a reference to soil (page 19) which identifies Rochford as an exception in relation to soil quality. It is not an absolutely precise reference and it does not lead on to any other area of analysis.

The following observations points arise from the Enfusion Sustainability Appraisal Technical Report and in particular paragraphs 5.4 to 5.10. Paragraph 5.5 states that 'Once the size of settlements in question was taken into account, it can be considered that edge of settlement could still be located within an adequate distance to services and employment.' This paragraph considers that negative effects such as landscape impact are a 'policy conflict' rather than a 'sustainability one'. It seems to us that the Council has implicitly included all the matters we are concerned about i.e. agricultural land quality, protection of conservation assets, character of settlement edge under this heading of policy conflict rather than sustainability conflict. This can be the only explanation as to why such matters have not been analysed or subjected to comparative site assessment. It is possible that the emphasis placed by Enfusion in paragraph 5.5 has encouraged this mistake.

Enfusion specifically reserve consideration of sustainability effects to a later date (paragraph 5.6.) pending consideration of specific location. We say that the Core Strategy broader locations cannot be relied upon without proper consideration of sustainability effects.

Paragraph 5.9 mentions soil but does not deal with agricultural land classification. It suggests that effects can be mitigated through design where in fact a much more important decision about protecting the best and most versatile land needs to be made first.

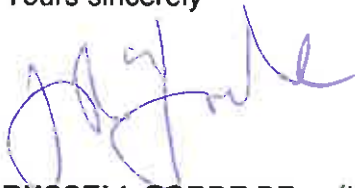
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The conclusion in paragraph 5.10 that 'The actual locations for growth proposed in the policy are considered to be most sustainable options available...' is not based on any detailed analysis or comparative assessment of the options.

In summary conclusion the Council's 'audit trail' does not provide a road map to answer the specific questions posed on day 2 of the Examination. Therefore it implicitly demonstrates that these matters have not been satisfactorily addressed by the Council in their preparation of the Core Strategy. It follows, for all the reasons stated in Smart Planning's Final Submission to the Examination that the broad locations for development are not justified and hence the Core Strategy is unsound. If any confusion remains on this point we would respectfully request that the Examination be reconvened to consider the above points.

This concludes our submissions on this matter, if there are any matters arising then we would be pleased to assist.

Yours sincerely



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c.c. Mrs A Henwood